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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

KFIL Inc.
Box 377
Preston, MN 55965
Telephone: (507)765-3856

July 20, 1992

Federal Communications Commission
Secretary
Ms. Donna R. Searcy
1919 M Street N.W.
Washington, DC 20554

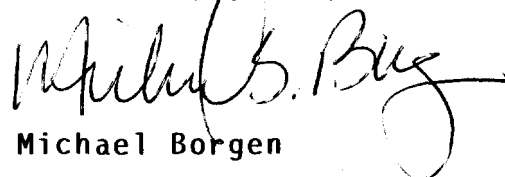
BY FEDERAL EXPRESS

Re: Amendment of Section 73.202(b), Table of Allotments
FM Broadcast Stations (Preston, Minnesota)

Dear Ms. Searcy:

Enclosed herewith for filing please find the original and four copies of the Petition for Rule Making in the above-referenced proceeding.

Very truly yours,


Michael Borgen

MB/bg

Enclosures

cc Mr. Garrett G. Lysiak, P.E.

No. of Copies rec'd 12+4
List A B C D E

FOR MAIL BRANCH

Before the
AUG 3 1992 Federal Communications Commission
Washington, D.C. 20554

In the Matter of

MM Docket No. 91-___

Amendment of Section 73.202(b)
Table of Allotments
FM Broadcast Stations

(Preston, Minnesota)

To: Chief, Allocations Branch

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

PETITION FOR RULE MAKING

KFIL Inc., pursuant to Section 1.420 of the Commission's Rules, respectfully requests that the Commission institute a rule making proceeding to make changes in the FM Table of Allotments, Section 73.202(b) of the Commission's Rules, as follows:

<u>Location</u>	<u>Present</u>	<u>Proposed</u>
Preston, MN	276A	276C3

In support of this proposal, the following is shown:

1. As described in the attached Engineering Statement, the proposed coordinates meet FCC spacing requirements set forth in Section 73.207 of the FCC Rules, as well as FCC signal coverage requirements set forth in Section 73.315(a) of the FCC Rules.

2. The proposed allotment would provide Preston, Minnesota and surrounding environs with full time regional broadcast service as well as first aural service.

¹ The coordinates for this allotment are 43 44' 38" North Latitude, 91 54' 04" West Longitude.

3. If the proposed allotment is granted, KFIL Inc. presently intends to file an application for channel 276C3 and, if authorized, to build a station promptly.

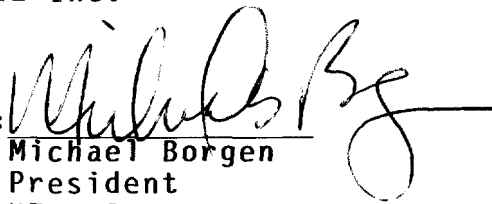
4. The public interest would be best served by issuing a notice of proposed rule making and allotting Channel 276C3 to Preston, Minnesota.

WHEREFORE, for all the foregoing reasons, KFIL Inc. respectfully requests that the Commission commence a rule making proceeding proposing the amendment of the Table of Allotments, FM Broadcast Stations, to include an allotment of Channel 276C3 to Preston, Minnesota.

Dated: 7/28/92

Respectfully submitted,

KFIL Inc.

By: 
Michael Borgen
President
KFIL Inc.

Box 377
Preston, Minnesota 55965
Telephone: (507) 765-3856



OWL ENGINEERING, INC.

CONSULTING COMMUNICATIONS ENGINEERS

1306 W. County Road F, St. Paul, MN 55112
(612) 631-1338 • Fax (612) 631-3502

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AUG 3 1992

**ENGINEERING STATEMENT ON BEHALF OF
KFIL INCORPORATED
IN SUPPORT OF A PETITION TO AMEND
THE FM TABLE OF ALLOTMENTS
CHANNEL 276C3 TO PRESTON, MINNESOTA**

July 14, 1992

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KFIL INCORPORATED
IN SUPPORT OF A PETITION TO AMEND
THE FM TABLE OF ALLOTMENTS
CHANNEL 276C3 TO PRESTON, MINNESOTA**

Owl Engineering, Inc. has been retained by KFIL Incorporated (hereafter KFIL) to prepare this Engineering Statement in support of a petition to amend the FM Table of Allotments, FCC Rules Section 73.202(b) as follows:

<u>Location</u>	<u>Present</u>	<u>Proposed</u>
Preston, MN	276A	276C3

The reference coordinates used for this study are:

43 44' 38" North Latitude
91 54' 04" West Longitude

A full class C3 facility operating from the proposed site coordinates will provide 60 dBu (1 mV/m) signal coverage to the population encompassed by an area of approximately 4,815 square kilometers. Preston has a population of 1,530 based on 1990 U.S. Census data.

The proposal of KFIL was evaluated to determine if the proposed site coordinates would meet FCC spacing requirements. That analysis is attached as Engineering Exhibit E-1. As can be seen from exhibit E-1, KFIL's proposal meets all FCC spacing requirements set forth in section 73.207 of the FCC Rules. The reference coordinates proposed by KFIL represent a 17 kilometer site restriction to the north east.



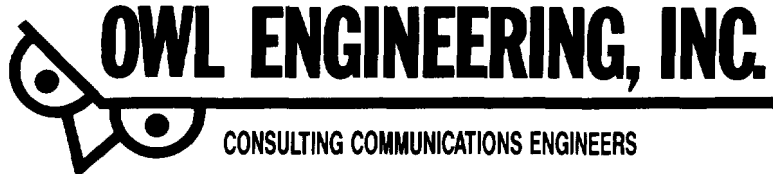
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THE FM TABLE OF ALLOTMENTS
CHANNEL 276C3 TO PRESTON, MINNESOTA**

The proposal of KFIL was evaluated to determine if the proposed site would meet FCC signal coverage requirements. The distance from the reference coordinates to the city of Preston is 17 kilometers at a bearing 240.8 degrees. The three to sixteen kilometer average terrain was computed using the NGDC data base and the distance to contours was computed using the FCC F(50,50) metric curves. The distance to the 70 dBu contour along the radial through the principle city was calculated to be 26.5 kilometers, surpassing the city by some 9 kilometers. Engineering Exhibit E-2 shows the 70 dBu contour plotted and demonstrates that the entire city of Preston is served by a signal strength of 70 dBu or greater.

A comparison of the area/population served by the 60 dBu coverage contour of the higher class channel to Class A facilities was completed. Utilizing the reference Height Above Average Terrain (HAAT) and Effective Radiated Power (ERP) for each class of station, the following data was calculated:



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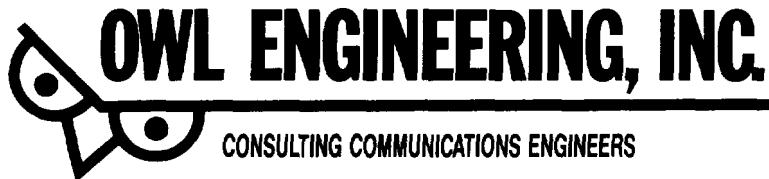
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THE FM TABLE OF ALLOTMENTS
CHANNEL 276C3 TO PRESTON, MINNESOTA**

Station Class	Area Served km ²	Population Served (1990 Census)
C3	4,815	73,900
A	2,496	20,555

Based on the above calculations, it can be determined that the proposed class C3 facilities will increase the area served by 93 percent and the population served by 259 percent.

Based on the engineering studies provided, the following conclusions can be obtained:

1. The proposal will provide Preston with a full time regional broadcast service.
2. The proposal will meet the requirements of FCC Rules Section 73.315.
3. The proposal will meet the requirements of FCC Rules Section 73.207.
4. The proposal will increase the area served by 93 percent.
5. The proposal will increase the population served by 259 percent.



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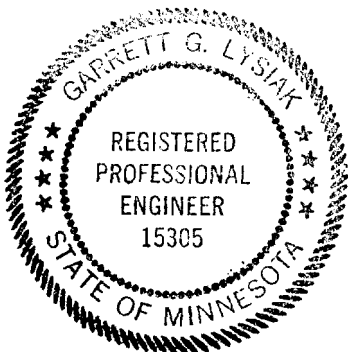
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IN SUPPORT OF A PETITION TO AMEND
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CHANNEL 276C3 TO PRESTON, MINNESOTA**

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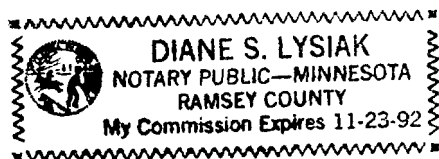
RAMSEY COUNTY)
)
STATE OF MINNESOTA) ss:

Garrett G. Lysiak, being first duly sworn, says that he is president of Owl Engineering, Inc., consulting communications engineers with offices in Arden Hills, Minnesota; that his qualifications as an expert in communications engineering are a matter of record with the Federal Communications Commission; that the foregoing exhibit was prepared by him and under his direction; and that the statements contained therein are true of his own personal knowledge except those stated to information and belief and, as to those statements, verily believes them to be true and correct.



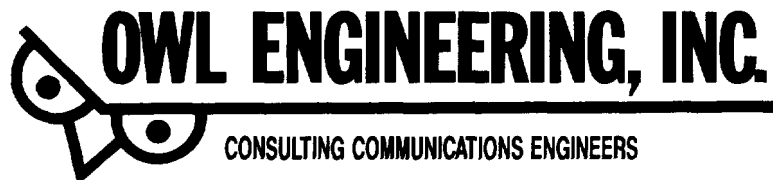
Garrett G. Lysiak, P.E.

Subscribed and sworn to before me this date July 14, 1992



Diane S. Lysiak
Notary Public

My commission expires November 23, 1992



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**ENGINEERING EXHIBIT E-1
KFIL INCORPORATED
IN SUPPORT OF A PETITION TO AMEND
THE FM TABLE OF ALLOTMENTS
CHANNEL 276C3 TO PRESTON, MINNESOTA**

FM Channel 276-C3

LATITUDE: 43° 44' 38"
LONGITUDE: 91° 54' 4"

CHNL Call	City	Class	Calculated Km.	Required Km.	Delta km.	Bearing °
222	NO CONFLICT					
223	NO CONFLICT					
273 KQLW	FMMN Wabasha	A	70.83	42	28.83	348.37
273 KQLW	FMMN Lake City	C3	71.41	43	28.41	326.66
273	FAMN Lake City	C3	72.81	43	29.81	325.68
274	FAMN La Crescent	C3	48.21	43	5.21	88.43
274 KQEG	FMMN La Crescent	C3	43.50	43	0.50	80.60
274 KQEG	FMMN La Crescent	A	43.50	42	1.50	80.60
275	FAIA Cedar Rapids	C1	185.51	144	41.51	174.76
275	FAMN Minneapolis	C	176.64	176	0.64	326.57
275 KQCR	FMIA Cedar Rapids	C1	185.51	144	41.51	174.76
275 WLTE	FMMN Minneapolis	C	175.58	176	-0.42	326.81
276 KLKK	FMIA Clear Lake	A	141.86	142	-0.14	238.02
276 KLKK	FRIA Clear Lake	A	144.66	142	2.66	236.43
276	FAIA Clear Lake	A	141.59	142	-0.41	238.29
276 KLKK	FMIA Clear Lake	A	141.59	142	-0.41	238.29
277	FAWI Wisconsin Rapid	C1	181.53	144	37.53	64.93
277 WWRW	FMWI Wisconsin Rapid	C1	181.53	144	37.53	64.93
278	FAIA Waukon	C2	53.56	56	-2.44	141.71*
278 KNEIFM	FMIA Waukon	C2	61.55	56	5.55	145.07
279	NO CONFLICT					

* The allocation record at Waukon, IA does not require protection. KNEIFM was granted a Construction Permit on May 10, 1992.

WESTERN UNITED STATES 1:250,000

